

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	
	§	
	§	CASE NO: 23-42104-EB
TIGHT ENDS SPORTS BAR & GRILL, INC.,	§	
	§	
Debtor.	§	CHAPTER 11-TXEB
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	§	
SALT & PEPPER RESTAURANTS, INC.	§	
	§	
vs.	§	ADVERSARY NO. 23-04100
	§	
TIGHT ENDS SPORTS BAR & GRILL, INC. and TIMOTHY DUNGAN,	§	
	§	
	§	
Defendants.	§	
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**OBJECTION OF DEBTOR TO MOTION TO REMAND (RE: DOCKET
NOS. 5, 6)**

TO THE HONORABLE BRENDA T. RHOADES, U.S. BANKRUPTCY JUDGE:

Tight Ends Sports Bar & Grill, Inc., Debtor and Defendant, files this Objection to the Motion for Remand (Docket No. 5) and Brief in Support (Docket No. 6) of Plaintiff, Salt & Pepper Restaurants, Inc. (“SNPR”) and in support of such objection would show the Court the following.

1. As set forth in the Brief of the Debtor filed concurrently herewith, the Debtor respectfully requests that the Court DENY the Motion to Remand.
2. SNPR has failed to satisfy its burden and demonstrate sufficient grounds under equitable remand, mandatory abstention, and/or permissive abstention.
3. In fact, as further discussed in the brief of the Debtor, SNPR has filed a proof of claim in the underlying bankruptcy case, Proof of Claim No. 6, which circumstance conclusively resolves the pending motion in favor of the Debtor.

WHEREFORE, Tight Ends Sports Bar & Grill, Inc., Debtor and Defendant, respectfully requests that the Court deny the Motion to Remand (Docket No. 5). Debtor respectfully requests such other and further relief to which Debtor is entitled at law or in equity.

Dated: January 15, 2024

Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth
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ATTORNEYS FOR
TIGHT ENDS SPORTS BAR & GRILL, INC.
DEFENDANT AND DEBTOR IN POSSESSION

CERTIFICATE OF SERVICE

On January 15, 2024, I hereby certify that a true and correct copy of the foregoing was served upon all registered ECF users who have appeared in this case.

/s/ Jeff Carruth
Jeff Carruth